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Steven H. Newman, Esq.  
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**Hearing Date:** November 18, 2020  
**At:** 10:00 a.m.

*Attorneys for MLF3 Atlantic LLC*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re

Chapter 11

ATLANTIC 111ST LLC,

Case No. 8-19-73137 (reg)

Debtor.

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**NOTICE OF MOTION FOR AN ORDEER (I) CONVERTING THIS CHAPTER 11  
CASE TO A CASE UNDER CHAPTER 7 PURSUANT TO 1112(B),  
AND (II) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE**, that MLF3 Atlantic LLC (“**Lender**”), by its undersigned counsel, will move this Court before the Honorable Robert E. Grossman, at the United States Bankruptcy Court for the Eastern District of New York, located at the Alfonse M. D’Amato U.S. Courthouse, 290 Federal Plaza, Central Islip, New York 11722, Room 860, on November 18, 2020 at 10:00 a.m., for the entry of an Order: (i) converting the Chapter 11 case of Atlantic 111st LLC to a case under Chapter 7 pursuant to § 1112(b) of the Bankruptcy Code and (ii) granting Lender related relief (the “**Motion**”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be served at least seven (7) days prior to the

return date on this Motion upon (i) Katsky Korins LLP, Attention, Steven H. Newman, Esq. and Robert A. Abrams, Esq., 605 Third Avenue, New York, New York 10158, and (ii) all other parties entitled to notice.

Dated: New York, New York  
November 3, 2020

Respectfully submitted,

**KATSKY KORINS LLP**

By: /s/ Robert A. Abrams  
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